

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: Jeffrey Lynn Goss  
Debtor

CHAPTER 13

JPMorgan Chase Bank, National Association,  
Movant,  
v.

BANKRUPTCY CASE NUMBER  
18-04257/RNO

Jeffrey Lynn Goss,  
Respondent/Debtor,  
and  
Charles J. DeHart, III, Trustee,  
Additional Respondent.

**OBJECTION OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION TO  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

JPMorgan Chase Bank, National Association, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about October 8, 2018, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 373 Tow Hill Road, Port Matilda, PA 16870.
3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$19,065.33, and a total claim in the amount of \$113,496.66.
4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$19,065.33 to be paid to the Trustee through the Plan 90 days after confirmation of the plan.
5. The plan provides for the following treatment of this creditor:

PAY ARREARS PER ALLOWED PROOF OF CLAIM BUT WILL NOT START MAKING PAYMENTS TO TRUSTEE OR TO REGULAR POST-PETITION PAYMENTS FOR 90- DAYS.; WILL REFINANCE TO A REVERSE MORTGAGE WITHIN 6 MONTHS OF FILING; DEBTOR LIST POTENTIAL LAWSUIT AGAINST CHASE IN PARAGRAPH 3 PAGE 2 OF TEN OF PLAN.

Creditor does not consent to this treatment. The case was filed in 2018.

6. The Plan fails to comply with 11 U.S.C. § 1322.
7. The Plan fails to comply with 11 U.S.C. § 1325.
8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, JPMorgan Chase Bank, National Association respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: March 18, 2021

BY: \_\_\_\_\_  
Kristen D. Little, Esquire  
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LLG File #:18-059106

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**CERTIFICATE OF SERVICE**

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of JPMorgan Chase Bank, National Association's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on March 18, 2021:

Jeffrey Lynn Goss  
PO Box 17  
State College, PA 16804

Kara Katherine Gendron, Esquire  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
Sent via electronic notification karagendronecf@gmail.com

Charles J. DeHart, III, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Sent via electronic notification dehartstaff@pamd13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Kristen D. Little

Kristen D. Little  
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(610) 278-6800

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